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fka CHRISTA SHEDD and
BRADLEY RANDALL

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

METROPOLITAN LIFE INSURANCE
COMPANY,

Plaintiff,

v.

DAVID M. DOWNES, DANIEL R.
DOWNES, COLLEEN P. DOWNES,
KAREN A. MACAULAY, BRADLEY
RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS CHRISTA D.
SHEDD and BRADLEY RANDALL TO
RESPOND TO DEFENDANTS DAVID
M. DOWNES, DANIEL R. DOWNES,
COLLEEN P. DOWNES, AND KAREN
A. MACAULAY'S MOTION FOR
JUDICIAL NOTICE OF STATE OF
NEVADA, DISTRICT COURT'S (1)
STIPULATED DECREE OF DIVORCE,
AND (2) ORDER FROM MARCH 26,
2019 HEARING, AND MOTION FOR
SUMMARY JUDGMENT; ORDER**

[SECOND REQUEST]

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall may have additional time, up to and including June 2, 2023, within which to file their response/opposition to Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and (2) Order from March 26, 2019 Hearing [Doc. 21] and Motion for Summary Judgment [Doc. 22]. Therefore, the last day for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall Defendant to file their response/opposition to the Motion for Judicial Notice [Doc. 21] and the Motion

1 for Summary Judgment [Doc. 22] will be June 2, 2023.

2 Good cause exists as there are pending motions and matters in the divorce case in the Eighth
3 Judicial District Court. That is the same divorce case in which the orders that are the subject of the
4 Motion of Judicial Notice and Motion for Summary Judgment are filed. Defendants Christa Downes
5 and Karen Macaulay need additional time to reach a stipulation, or to obtain an order from the Court,
6 regarding the parties' use of some of the sealed documents in the divorce case.
7

8 This document is being electronically filed through the Court's ECF System. In this regard,
9 counsel for Defendants Christa D. Shedd aka Christa Downes and Bradley Randall hereby attests that
10 (1) the content of this document is acceptable to all persons required to sign the document; (2) Counsel
11 for Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay
12 Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this
13 concurrence is available for inspection or production if so ordered.
14

15 DATED this 26th day of April, 2023.

16 CLARK MCCOURT

17 /s/ Brian P. Clark

18 Brian P. Clark (Nevada Bar No. 4236)
19 Lukas B. McCourt (Nevada Bar No. 11839)
20 7371 Prairie Falcon Road, Suite 120
21 Las Vegas, NV 89128
22 Attorneys for Defendants David R. Downes,
23 Daniel Downes, Colleen P. Downes, and
24 Karen A. Macaulay

25 DATED this 26th day of April, 2023.

26 NEHME-TOMALKA AND ASSOCIATES

27 /s/ Doris Nehme-Tomalka

28 Doris Nehme-Tomalka (Nevada Bar No. 6431)
2620 Regatta Drive, Suite 102
Las Vegas, NV 89128
Attorney for Defendant
Christa Downes aka Christa Shedd

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED.**

Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall shall have up to and including June 2, 2023 to file their response/opposition to Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and (2) Order from March 26, 2019 Hearing [Doc. 21] and the Motion for Summary Judgment [Doc. 22].

DATED: May 1, 2023

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

**MIRANDA M. DU,
CHIEF UNITED STATES DISTRICT JUDGE**